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Attorneys for Defendant  
STATE OF CALIFORNIA, by and through the Department of Motor Vehicles

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

LAUREL ASHLEY

Plaintiff,

v.

STATE OF CALIFORNIA  
(DEPARTMENT OF MOTOR  
VEHICLES)

Defendant.

CASE NO. 2:21-cv-02062-KJM-JDP  
Civil Rights

**STIPULATION AND ORDER TO  
CONTINUE THE DEADLINE FOR  
DEFENDANT TO RESPOND TO THE  
COMPLAINT**

Action Filed: November 8, 2021

**STIPULATION**

Plaintiff LAUREL ASHLEY (“Plaintiff”) and Defendant STATE OF CALIFORNIA  
(DEPARTMENT OF MOTOR VEHICLES) (“Defendant”) – Plaintiff and Defendant together the  
“Parties” – hereby stipulate and request that the Court continue the deadline for Defendant to

1 respond to the Complaint in order to give the Parties time to resolve this matter without need for  
2 protracted litigation and further expense. This request is based on the following good cause:

- 3 1. Plaintiff filed this action on November 8, 2021. Dkt. No. 1.
- 4 2. Defendant was served with the Complaint on November 15, 2021. Dkt. No. 4.
- 5 3. The Parties are working cooperatively to exchange relevant information that may  
6 assist with a potential settlement of this action without the need to expend Court  
7 resources, and in keeping attorney fees and costs lower than they otherwise might be.
- 8 4. The Parties have previously stipulated to extend the time for Defendant to respond to  
9 the complaint so that they could continue to discuss early settlement. Dkt. No. 6.
- 10 5. The Parties request that the Court continue the deadline for Defendant to respond to  
11 the Complaint until January 28, 2021, so that they can continue settlement discussions.

12 **IT IS SO STIPULATED.**

13  
14 Date: January 5, 2022

REIN & CLEFTON

15 /s/ Aaron M. Clefton  
16 By AARON M. CLEFTON, Esq.  
17 Attorney for Plaintiff  
LAUREL ASHLEY

18 Date: January 6, 2022

ROB BONTA  
Attorney General of California  
CATHERINE WOODBRIDGE  
Supervising Deputy Attorney General

20  
21 /s/ Erick J. Rhoan  
22 By ERICK J. RHOAN, Esq.  
23 Attorney for Defendant  
STATE OF CALIFORNIA *by and through*  
24 *the Department of Motor Vehicles*

**ORDER**

GOOD CAUSE BEING SHOWN, it is so ORDERED. Defendant shall have until January 28, 2022, to file a responsive pleading to Plaintiff's Complaint.

IT IS SO ORDERED.

Dated: January 12, 2022

  
CHIEF UNITED STATES DISTRICT JUDGE